

*Certified Organic Farm  
Growing Since 1976*



*Mail Order Catalog  
Retail/Wholesale*

Agricultural Marketing Service  
US Dept of Agriculture  
Washington DC

March 21, 2001

FAX (202)205-7808

Dear AMS:

Re: Docket # TMD-00-02-FR - Commercial Availability Standard

By way of introduction we are an organic farm certified by MOFGA since 1982 and OCIA since 1987. We have been organically growing Maine Certified seed potatoes since the mid-1980s. We direct market nationally via our mailorder catalog and have customers in all 50 states. Additionally, we also wholesale our sixteen varieties of Certified seed potatoes to five national mailorder seed companies. Currently, sales of our Certified seed potatoes make up over half of our gross sales. If our entire crop of potatoes were sold and utilized as seed potatoes, they would plant over 120 acres of tablestock or processing potatoes annually. Since we began growing Certified seed potatoes fifteen years ago, other organic farmers have begun raising Certified seed potatoes in Maine, Wisconsin, Alaska, Colorado, and elsewhere, including Canada.

This letter pertains to the request of the AMS to receive comments to help it devise its Commercial Availability Standard. Our comments do not focus on the minor ingredients in processed products issue, but rather on the commercially available provision for organically grown planting stock, specifically seed potatoes, contained in 205.204.

We believe the "commercial availability" of any organic item falls into one of three categories:

- Group 1) Item does not currently exist.
- Group 2) Item exists. However, current supply is insufficient to meet entire market demand.
- Group 3) Item exists. Supply is sufficient to meet current market demand.

It serves the best interest of the organic community to foster development of organic items in Group 1 and Group 2. Group 3 organic items, be they specific processed product ingredients or specific planting stocks should be required.

The current state of organic seed potatoes falls into Group 2. As such, we believe it is appropriate to require the use of organic seed potatoes by producers growing organic tablestock or processing potatoes. This demand will help create increased supply of organic seed potatoes. Suggestions:

**Quantity.** A single year exemption to this requirement may be granted by a certifier when written documentation is provided by the producer proving that reasonable but unsuccessful effort has been made to secure the needed organic seed potatoes. It would be appropriate for this documentation to include evidence of attempts at forward contracting with organic seed potato producers, especially after the first single-year exemption has been granted.

**Quality.** The onus should be upon the producer requesting exemption to document in writing why the quality, variety, or generation of a certain available lot of seed potatoes are lacking to such an extent as to make their purchase and use imprudent.

**Certified Seed Potatoes.** Because organic Certified seed potato producers, like their nonorganic counterparts, must regularly renew their planting stock in order to keep disease levels acceptively low to meet the requirements of seed potato certification agencies, as well as their customers, they should be allowed a standing exemption for the use of nonorganically grown Foundation seed potatoes which they officially enter in a recognized seed potato Certification Program.

We will be happy to answer any questions you may have.

*Jim & Megan Gerritsen*  
Sincerely Jim & Megan Gerritsen